

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**VICTOR NAHUM VARGAS,**  
[DOB: 05/04/1978]

Defendant.

No. 18-04066-01-CR-C-BCW

**COUNTS 1 and 2**

18 U.S.C § 922(d)(1)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

\$100 Special Assessment

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1**

(Knowingly Sold a Firearm to a Felon)

18 U.S.C. § 922(d)(1)

On or about April 18, 2018, within Cole County, in the Western District of Missouri, and elsewhere, the defendant, **VICTOR NAHUM VARGAS**, knowingly sold five (5) firearms to a person, knowing and having reasonable cause to believe, that such person had been convicted of a crime punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1), and 924(a)(2).

**COUNT 2**

(Knowingly Sold a Firearm to a Felon)

18 U.S.C. § 922(d)(1)

On or about May 11, 2018, within Cole County, in the Western District of Missouri, the defendant, **VICTOR NAHUM VARGAS**, knowingly sold eleven (11) firearms to a person, knowing and having reasonable cause to believe, that such person had been convicted of a crime

punishable by imprisonment for a term exceeding one year, all in violation of Title 18, United States Code, Sections 922(d)(1) and 924(a)(2).

**A TRUE BILL.**

/S/ Samie Hill

**FOREPERSON OF THE GRAND JURY**

/S/ Lawrence E. Miller

**Lawrence E. Miller**

Assistant United States Attorney

Missouri Bar No. 35931

Dated: 06/06/2018